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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

TRAVIS WILKERSON,
TYLER WILKERSON,
ANDREW HARLIN and
VICTORIA GARCIA,

Plaintiffs,

vs.

CITY OF SAN DIEGO,
KEVIN ARMENTANO,
OFFICER MENDENHALL,
OFFICER MINTER,
OFFICER SHUMATE,
OFFICER VALDEZ,
JOHN STEFFEN
and DOES 1-20,

Defendants.

) Case No. 12cv2994-WQH (BGS)

) **PLAINTIFFS' PRETRIAL
DISCLOSURES UNDER FEDERAL
RULE 26(a)(3)**

) Pretrial Conf.: July 25, 2014
) Time: 11:00 a.m.
) Courtroom: 14B
) Judge: Hon. William Q. Hayes

1 Pursuant to F.R.C.P. Rule 26(a)(3), Plaintiffs hereby provide the following
2 information regarding the evidence they may present at trial:

3 **A. WITNESSES**

4 Plaintiffs expect to call the following witnesses at trial in this case:

- 5 1. Travis Wilkerson – Plaintiff
- 6 2. Tyler Wilkerson – Plaintiff
- 7 3. Andrew Harlin – Plaintiff
- 8 4. Victoria Garcia – Plaintiff
- 9 5. Kevin Armentano – Defendant
- 10 6. Chad Mendenhall – Defendant
- 11 7. Gregory Minter – Defendant
- 12 8. Craig Shumate – Defendant
- 13 9. John Steffen – Defendant
- 14 10. Jon Goebel – SDPD
- 15 11. Erick Valdez – SDPD
- 16 12. Carlos Real – SDPD
- 17 13. Michael Fitzgerald – 4817 East Washington, Fresno, CA 93727
- 18 14. Ali Abdalla Maawy, M.D. – c/o UCSD Medical Center, 200 W.
19 Arbor Drive, San Diego, CA 92103
- 20 15. Vishal Bansal, M.D. – c/o UCSD Medical Center, 200 W. Arbor
21 Drive, San Diego, CA 92103
- 22 16. Ralph J.F. Borriello – 5445 Dandridge Lane #129, San Diego, CA
23 92115
- 24 17. Scott Thompson, M.D., VA San Diego Hospital/Healthcare System,
25 3350 La Jolla Village Drive, San Diego, CA. 92161.
- 26 18. L.A. Constantino, Nurse Practitioner, VA San Diego
27 Hospital/Healthcare System, 3350 La Jolla Village Drive, San Diego,
28 CA. 92161.

1 19. Derborah Yarborough, R.N., VA San Diego Hospital/Healthcare
2 System, 3350 La Jolla Village Drive, San Diego, CA. 92161.

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4 Plaintiffs may also present testimony from the following witnesses if the
5 need arises:

- 6 20. Judy Bergman - SDPD Communications Records Custodian
7 21. Karen Morris - SDPD Communications Records Custodian
8 22. Joseph Waggaman - SDPD
9 23. Joshua Burkhardt - SDPD
10 24. Laura Shands – Deputy, S.D. County Sheriff Dept.
11 25. Jeremy Sheppard – Deputy, S.D. County Sheriff Dept.
12 26. Haley Ruth Rice – 8724 Foxborough Ct., Lakeside, CA 92040
13 27. Derek Diaz – Internal Affairs, SDPD
14 28. Steven Eraca – SDPD
15 29. Jose Conde – SDPD
16 30. Roberto Casillas – Internal Affairs, SDPD
17 31. Juan Alva – Officer, Escondido Police Department
18 32. Shauna Grisler – Officer, Escondido Police Department
19 33. Jared Lunt – Officer, Escondido Police Department
20 34. Ryan Fien – Officer, Escondido Police Department
21 35. David Rohowits – Commanding Officer, SDPD Eastern Division
22 36. Mark Jones – Commanding Officer, SDPD Central Division
23 37. Daniel Douglas – Administration, SDPD Central Division
24 38. Rabah Belabes – 8381 Reagan Glen Road, San Diego, CA 92127.
25 (858) 610-0922
26 39. Kristopher Keel – c/o Rural Metro/CT Corporation System, 818 W.
27 Seventh St., 2nd Floor, Los Angeles, CA. 90017
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- 1 40. Charles J. Wilmoth, c/o Rural Metro/CT Corporation System, 818 W.
2 Seventh St., 2nd Floor, Los Angeles, CA. 90017
3 41. Janet Dove, N.P., c/o UCSD Medical Center, 200 W. Arbor Drive,
4 San Diego, CA 92103
5 42. Fukai Leo Chuang, M.D., VA San Diego Hospital/Healthcare System,
6 3350 La Jolla Village Drive, San Diego, CA. 92161.
7 43. Aileen Chang, M.D., VA San Diego Hospital/Healthcare System,
8 3350 La Jolla Village Drive, San Diego, CA. 92161.
9 44. Alice Tsai, D.O., L.A. Constantino, Nurse Practitioner, VA San
10 Diego Hospital/Healthcare System, 3350 La Jolla Village Drive, San
11 Diego, CA. 92161.
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13 **B. EXHIBITS**

14 Plaintiff expects to offer the following exhibits into evidence:

15	Number	Date	Date	Description
16		Marked	Admitted	
17	1.			Photo - Travis Wilkerson wrists
18	2.			Photo - Travis Wilkerson wrists
19	3.			Photo - Travis Wilkerson wrists
20	4.			Photo - Travis Wilkerson hands
21	5.			Photo - Travis Wilkerson face, right
22	6.			Photo - Travis Wilkerson face, front
23	7.			Photo - Travis Wilkerson head, right
24	8.			Photo - Travis Wilkerson right knee
25	9.			Photo - Andrew Harlin face, front
26	10.			Photo - Andrew Harlin mouth, front
27	11.			Photo - Andrew Harlin wrist
28	12.			Photo - Andrew Harlin wrist

1	13.	Photo - Andrew Harlin index finger
2	14.	Photo - Andrew Harlin knuckle
3	15.	Photo - Travis Wilkerson face, front
4	16.	Photo - Travis Wilkerson forehead,
5		right
6	17.	Photo - Travis Wilkerson forehead,
7		front
8	18.	Photo - Travis Wilkerson forearm
9	19.	Photo - Travis Wilkerson hands
10	20.	Photo - Travis Wilkerson right knee
11	21.	Photo - Andrew Harlin face, front left
12	22.	Aerial Photo
13	23.	Aerial Photo
14	24.	Aerial Photo
15	25.	Aerial Photo
16	26.	Photo of Scene
17	27.	Photo of Scene
18	28.	Photo of Scene
19	29.	Photo of Scene
20	30.	Photo of Scene
21	31.	Photo of Scene
22	32.	Photo of Scene
23	33.	Photo of Scene
24	34.	Photo of Scene
25	35.	Photo of Scene
26	36.	Photo of Scene
27	37.	Photo of Scene
28	38.	Photo of Scene

1	39.	Photo of Scene
2	40.	Photo of Scene
3	41.	Jail Records, Tyler Wilkerson
4	42.	Jail Records, Travis Wilkerson
5	43.	SDPD Policy and Procedures
6	44.	SDPD CAD printouts of incident
7	45.	SDPD Comm. Tapes and Records
8	46.	Deposition transcript, Mike
9		Fitzgerald
10	47.	Medical Records, Andrew Harlin
11	48.	Medical Records, Travis Wilkerson
12	49.	Medical Bills, Andrew Harlin
13	50.	Documents and recordings from
14		Internal Affairs Investigation No.
15		2013-055, re: Craig Shumate
16	51.	Exhibits to depo of Travis Wilkerson
17	52.	Exhibits to depo of Tyler Wilkerson
18	53.	Exhibits to depo of Andrew Harlin
19	54.	Exhibits to depo of Victoria Garcia
20	55.	Exhibits to depo of Craig Shumate
21	56.	Exhibits to depo of Chad Mendenhall
22	57.	Exhibits to depo of Gregory Minter
23	58.	Exhibits to depo of John Steffen
24	59.	Exhibits to depo of Jon Goebel
25	60.	Exhibits to depo of Carlos Real
26	61.	Exhibits to depo of Erick Valdez
27	62.	Exhibits to depo of Michael
28		Fitzgerald

63.

Documents and recordings from
Internal Affairs Investigation re:
Chad Mendenhall

Dated: May 23, 2014

/s/ Michael R. Marrinan
Attorney for Plaintiffs
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